

NOTICE OF MOTION AND MOTION
FOR CHANGE OF VENUE

#2:14-CR-00027-NDF-2 ("SEALED") [sic]

FILED
U.S. DISTRICT COURT
DISTRICT OF WYOMING

2014 JUN 16 PM 2:44

STEPHAN HARRIS, CLERK
CHEYENNE

Margin

Notes:

"USDC/DWY"

TO: Office of Presiding Judge
U.S. District Court

2120 Capitol Avenue, 2nd Floor

Cheyenne 82001

Wyoming, USA

28 USC 1345

Comes now the United States ex rel.
Paul Andrew Mitchell, B.A., M.S., Citizen
of Washington State and Private

18 USC 1964

"WDWA"

FRCrP
Rule 18

"DWY"

Attorney General, to move this
honorable Court for a proper change
of venue to the Western District of
Washington at Seattle, pursuant to
Rule 18 of the Federal Rules of Criminal
Procedure. Venue is not proper in
the District of Wyoming for the following
well established reasons:

(1) Relator has repeatedly raised the issue
of venue at several hearings, beginning
1/28/2014 e.g. identity hearing;

(2) no rebuttals have been forthcoming
from any authorized personnel of the
United States; see 28 U.S.C. 544, 5 U.S.C. 3331-3333;

28 USC 544;

5 USC 3331,

3332, 3333

-1 of 3-

-1 of 3-

- 2 of 3 -

(3) Relator has stated verbally, and in writing, that he did not step one foot anywhere in Wyoming between a college ski trip to Jackson Hole in December 1968, and the false arrest on 1/28/2014;

(4) no evidence contradicting the latter statements has been forthcoming from any authorized personnel of the United States; see 28 U.S.C. 1345, 1346;

(5) the forty-two (42) discrete moves Relator has had to endure, at the hands of the U.S. Marshal Service, appear to be motivated by a specific intent to separate Relator from his Seattle apartment and the extensive legal and patent research Relator had accumulated there, chiefly to assist Relator's private clients; and,

(6) said 42 moves also appear to be motivated by criminal intents to inflict cruel and unusual summary punishment on Relator, also in connection with defamation per se of Relator by libeling Relator as an "Extremist Montana Freeman Associate" [sic] e.g. in booking records.

- 2 of 3 -

- 3 of 3 -

"WDWA"

Venue is proper in the Western District of Washington, at Seattle, for the following well established reasons:

(7) Relator lived and worked in Seattle, and nowhere else, between his arrival there on 6/18/2009, and the false arrest on 1/28/2014, ~ 4 1/2 years;
 (8) during the latter period, Relator did not travel outside the State of Washington; ^{and}

"USMS"

(9) one of Relator's five (5) meetings with a Deputy U.S. Marshal occurred in Relator's private Seattle apartment; as such, said Deputy was an eyewitness to the residential situs of Relator's

18 USC 1964 consulting practices, performed under 18 U.S.C. 1964.

REMEDY REQUESTED

In light of all the above, this Court should ORDER a routine change of venue from the District of Wyoming to the Western District of Washington at Seattle, pursuant to FRCrP Rule 18, and to honor Relator's fundamental Rights.

"DWY"

"WDWA"

Rule 18;
FRCrP

Respectfully submitted, All Rights Reserved,
 Paul Andrew Mitchen, B.A., M.S. (chosen name)

28 USC 1654 Relator In Propria Persona, 28 U.S.C. 1654;
 - 3 of 3 - Private Attorney General, 18 U.S.C. 1964

- 3 of 3 -

MODELESKI, M.P. (given name)

#45396

S.B.C.D.C.

P.O. Box 130

Gering, Nebraska

69341-0130

Re:

#2:14-CR-00027-NDF-2

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C.F. DEC 1-308

NORTH PLATTE NE 691

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LEGAL MAIL

TO: Clerk of Court, Office of

U.S. District Court

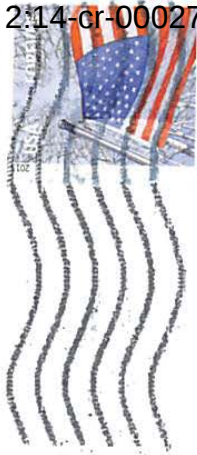
2120 Capitol Ave., 2nd Floor

Cheyenne 82001

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Scotts Bluff County Detention Center
Disclaims Any Responsibility For
The Nature of the Content of
This Correspondence
Administrator

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